

UNITED STATES DISTRICT COURT

for the

Central District of California

JOSE GUZMAN, FORTINO RUTILO JIMENEZ, AND
BERTHA MEZA, individually and on behalf of all
others similarly situated,

Plaintiff(s)

v.

THE WESTERN UNION COMPANY, d/b/a
WESTERN UNION FINANCIAL SERVICES INC.,
MONEYGRAM INTERNATIONAL, INC., (See
Attachment #1)

Defendant(s)

Civil Action No. 5:24-cv-00404

SUMMONS IN A CIVIL ACTION

To: *(Defendant's name and address)* The Western Union Company, d/b/a Western Union Financial Services Inc.
c/o registered agent CT Corporation System
Amanda Garcia
330 N. Brand Blvd, Glendale, CA 91203

(See Attachment #2)

A lawsuit has been filed against you.

Within 21 days after service of this summons on you (not counting the day you received it) — or 60 days if you are the United States or a United States agency, or an officer or employee of the United States described in Fed. R. Civ. P. 12 (a)(2) or (3) — you must serve on the plaintiff an answer to the attached complaint or a motion under Rule 12 of the Federal Rules of Civil Procedure. The answer or motion must be served on the plaintiff or plaintiff's attorney, whose name and address are:

Taras Kick (Cal. Bar No. 143379)
taras@kicklawfirm.com
Tyler Dosaj (Cal. Bar No. 306938)
tyler@kicklawfirm.com
THE KICK LAW FIRM, APC
815 Moraga Drive, Los Angeles CA 90049

If you fail to respond, judgment by default will be entered against you for the relief demanded in the complaint. You also must file your answer or motion with the court.

CLERK OF COURT

Date: 02/21/2024

Signature of Clerk or Deputy Clerk

Civil Action No. _____

PROOF OF SERVICE*(This section should not be filed with the court unless required by Fed. R. Civ. P. 4 (l))*

This summons for *(name of individual and title, if any)* _____
 was received by me on *(date)* _____ .

☐ I personally served the summons on the individual at *(place)* _____
 _____ on *(date)* _____ ; or

☐ I left the summons at the individual's residence or usual place of abode with *(name)* _____
 _____, a person of suitable age and discretion who resides there,
 on *(date)* _____, and mailed a copy to the individual's last known address; or

☐ I served the summons on *(name of individual)* _____, who is
 designated by law to accept service of process on behalf of *(name of organization)* _____
 _____ on *(date)* _____ ; or

☐ I returned the summons unexecuted because _____ ; or

☐ Other *(specify)*: _____

My fees are \$ _____ for travel and \$ _____ for services, for a total of \$ 0.00 .

I declare under penalty of perjury that this information is true.

Date: _____

Server's signature

Printed name and title

Server's address

Additional information regarding attempted service, etc:

Taras Kick (Cal. Bar No. 143379)
taras@kicklawfirm.com
Tyler Dosaj (Cal. Bar No. 306938)
tyler@kicklawfirm.com
THE KICK LAW FIRM, APC
815 Moraga Drive
Los Angeles, CA 90049
Tel: (310)395-2988 / Fax: (310)395-2088

Daniel H. Charest (*pro hac vice* to be filed)
dcharest@burnscharest.com
Darren Nicholson (*pro hac vice* to be filed)
dnicholson@burnscharest.com
Chase Hilton (*pro hac vice* to be filed)
chilton@burnscharest.com
BURNS CHAREST, LLP
900 Jackson Street, Suite 500
Dallas, TX 75202
Tele: (469)904-4550 / Fax: (469)444-5002

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

JOSE GUZMAN, FORTINO RUTILO
JIMENEZ, AND BERTHA MEZA,
individually and on behalf of all others
similarly situated,

Plaintiffs,

v.

THE WESTERN UNION COMPANY, d/b/a
WESTERN UNION FINANCIAL SERVICES
INC., MONEYGRAM INTERNATIONAL,
INC., MONEYGRAM PAYMENT
SYSTEMS, INC., and FORCEPOINT LLC.

Defendants.

CASE NO.: 5:24-cv-00404

CLASS ACTION

COMPLAINT FOR

(1) Violation of the California
Consumer Privacy Rights Act §
1798.150 *et seq.*; and
(2) Invasion of Privacy, California
Constitution Art. 1, § 1.

DEMAND FOR JURY TRIAL

UNITED STATES DISTRICT COURT CENTRAL DISTRICT OF CALIFORNIA

Jose Guzman et al. v. Western Union et al.
Case No. 5:24-cv-00404

Attachment #2-
Addendum to Summons

Defendants to be served:

Moneygram International, Inc.
c/o registered agent The Corporation Trust Company
Corporation Trust Center
1209 Orange Street
Wilmington, Delaware 19801

Moneygram Payment Systems, Inc.
c/o agent CT Corporation System
Amanda Garcia
330 N. Brand Blvd, Glendale, CA 91203

Forcepoint LLC
c/o registered agent Corporate Creations Network Inc.
Jennifer Lee
7801 Folsom Boulevard, #202,
Sacramento, Ca 95826